

To the District Court, Southern District of New York

UNITED STATES OF AMERICA

BY ANTOANETA IOTOVA AND ISSAK ALMALEH

vs.

OCWEN FINANCIAL CORPORATION

ALTISOURCE SOLUTIONS, INC.

ALTISOURCE ONLINE AUCTION, INC.

SHAPIRO & FISHMAN LLP

RONALD WOLFE AND ASSOCIATES (AKA FLORIDA DEFAULT LAW GROUP)

CIARFIELD, OKON, AND SALOMONE P. L.

BLANK AND ROME LLP

THE BLANCH LAW FIRM

FILED
CLERK OF COURT
SOUTHERN DISTRICT OF NEW YORK
2017 AUG 10 PM 3:02

17CV6316

Violations:

31 U.S.C. § 3729-3733 False Claims Act

**Major fraud against the United States – 1
count**

**Conspiracy to commit major fraud against
the United States –1 count**

Wire fraud – 1 count

May we please the Court, Plaintiffs appear on behalf of the United States of America in this qui tam case, a whistleblower case under 31 USC 3729-3733 code and claims as follows:

1. Defendants systematically has robbed the United States by stealing residential properties from 2008, selling them and keeping the proceedings of these sales in their companies at home and abroad without paying any taxes or any other obligations to the United States.
2. Defendants systematically and fraudulently has represented all of the major banks of the United States, including but not limited to Bank of America, Wells Fargo Bank, Chase Bank and many others dead or alive banks in fraudulent foreclosure schemes.
3. Defendants systematically were involved in fraudulent securitization of mortgages without having any kind of connection with the real owner and then have used these instruments for fraudulent foreclosures.
4. Defendants were systematically involved in robo signing of mortgages, mortgage assignments frauds, using existent and none existent assignors.
5. Defendants were systematically involved in exporting money abroad in the amount of trillion dollars to Europe, Africa and Asia, resulting from the sales of the US residential properties.
6. Defendants were systematically used the accumulated capital abroad in actions and schemes, acting against the interests of the United States of America, including terrorism.

History of the problem

1. The national wealth of the United States consists almost 70% of residential properties. After the big financial crisis hands of thousands attorneys are stretched to that wealth and without any active intervention from the prosecution, mainly on Federal level, these attorneys steal and sell the said properties with fraudulent documents and fraudulent representation of defaulted financial institutions. (Exhibit1) 90% of the money of these sales are

exported abroad to be covered the traces of the big theft. Plaintiffs noticed that in South Florida the most active participant in that fraud done on the foreclosure market was Ocwen Financial, for shortness here and further to be read Ocwen. Being a Liechtenstein registered corporation with the name Altisource, they exported all of the money accumulated abroad to India, Africa and Liechtenstein for financing of different schemes, including against the interests of the United States. In the last years this way illegally are sold around 500,000 properties and the profit from these sales have generated around 2 trillion dollars, and were hidden taxes of around 700 billion dollars. The Prosecutors offices on every level were informed for these crimes but didn't do anything to prevent the thefts. This is one of the biggest crime in the United States in the last years that drained the country of vital resources and left thousands American citizens on the streets and without homes. The above Defendants are involved in the disappearance of \$700 billion taxes from the government budget, a very serious federal crime.

2. Ocwen, the main participant in the scheme, owned one of these bogus banks in California, that defaulted during the crisis in 2008, but could steal some money and to transfer their activity on the East Coast. Their representatives are involved in all the robo signing of mortgage notes, and all fraudulent notarizations and transfers. One page of a Report with that content is presented in Exhibit 2. The report of 99 pages prepared from investigation of the Attorney General of Florida in 2011, where some of the investigated participants, like attorney Marshall Watson who was punished and attorney David Stern, who lost his attorney license. Ocwen and Shapiro and Fishman, the other two most mentioned companies, done the most of the fraudulent transactions, were not even touched, but increased their activity and occupied the business of the other companies. Now Ocwen pretends to represent all the US banks, all the financial institutions, dead or alive, because they had government umbrella and financial resources to smash anybody who would be willing to challenge them. They do most of the sales on the website Hubzu.com and that way avoiding any title searches and cloudy money transfers. The site is one illegal laundry of all illegal financial transactions,

through which big amounts of money change their ownership and money circulate easily in and out of the country. Actually Ocwen are foreign corporation, named Altisource, registered in Liechtenstein, offshore zone, who was involved in exporting money abroad to India and Africa to finance overseas illegal activity and terrorism.

3. Plaintiffs tried to inform many times during the last years FBI, the US Attorney, Department of Justice and the President of these crimes of Ocwen and connected attorneys, the Defendants above. Without much success. Nobody was charged and even touched. They continued to do their criminal business untouched. Instead Preet Bharara former US Attorney, together with some investigators federal agents start malicious prosecution and active chase on Plaintiffs family and the companies owned by the Plaintiffs and the properties of the Plaintiffs, who are doing only legal business activity, under legally registered US corporations. The family of the Plaintiffs is exposed to constant political, economic and psychological terror in the last years. The idea is to smother the Plaintiffs financially, they to accept claimed assumptions and to be deprived of liberty and their mouths shut. The whole campaign is organized under the supervision and order of the corporation Ocwen on behalf of which were sold thousands illegally obtained properties. The State Attorney of New York State restricted the activity of the said corporation in the state, but they continued to operate actively in South Florida, where the Plaintiffs currently reside. In South Florida Ocwen became absolute monopolist on the whole residential market after the expropriation of roughly 65000 properties, again with fraudulent documents and fraudulent representation.
4. The scheme is as follows, Most of the residential properties entered the crises of 2008 with big mortgages to different financial institutions. Then these mortgages has to be foreclosed. But the Law has very strict and different regulations that require preparing of documents. No matter if the mortgagor even exist, the Defendants prepared fraudulent assignments of mortgages, signed by one of the people in their firm, then they used an attorney to file a mortgage foreclosure case in the court, the price of 400 dollars. Some of the judges that required more strict policy against the so called "banks", actually

the said Defendants, were fired to be cleared the process of further fraudulent foreclosure. Without any problems and not much money spent in court proceedings, usually not more than 2000 dollars, the criminals, the said Defendants, acquired the houses of thousands of people.

5. The said residential properties, after being foreclosed with fraudulent documents, meaning stolen, are sold through auction sites, like Hubzu.com, owned by Altisource. There, the corporation declares that it owns all the properties, that actually are bank owned, REO properties of the biggest banks in the US. Then the titles are prepared in the offices of Ocwen in Georgia, where they have headquarters and then the money start their route abroad. This scheme is made by different attorneys, including the Defendants here, who partly worked for themselves or partly hide behind Ocwen, saying that they represent Ocwen, who represent the bank X or Y, as servicer of the bank X or Y and the mortgage foreclosed. Mostly the deeds are signed by the secretary in the office of Ocwen, Jami Dorobiala, a notary public. The same woman is involved in many robo signing schemes in California and is mentioned in many reports of different fraud investigations. Also other names are largely used like Linda Green and Scott Anderson, again from Ocwen.
6. Plaintiffs started to search methods to prevent the scheme without much success. They believed that the chaos created by that crime could have devastating consequence to the United States market and could deprive the country of vital resources. When they started their own investigation, brutal attacks against the Plaintiffs started in 2015 with an attack of the police in Hallandale Beach, Florida, organized against the Plaintiff Antoaneta Iotova. She, being in an isolated place, local tennis court, with two minor kids, was attacked by three police cars and accused of felony for playing tennis with more than eight balls and was forced and pressed to death by more than 5 police officers. The real reason for this attack was that the Plaintiff has to appear the next day in court as representative of one of her corporations and to fight against the same corporation Ocwen regarding the ownership of a property. The leading police officer of the attack in the tennis court is of Indian origin, named Cheryl Ramsaroop. That is how things started to evolve

and to be discovered the umbrella above the activity of Ocwen, the Indian connection. It appeared that the company has Indian origin and the main office is in India, so it is an Asian corporation.

7. Ocwen changed its ethnical characteristic in the last years and hired many Indians, including criminals. Pictures of the staff are attached from the Facebook profile of the corporation Altisource in Exhibit 3, where these people celebrate and boast they have smashed another company from their competition NationStar Mortgage. The leading police officer of the attack in the tennis court is also of Indian origin, named Cheryl Ramsaroop. The ex USA Attorney from New York, leading the investigation against the Plaintiffs is also of Indian origin named Preet Bharara. Indian engineers and computer specialists from Ocwen started to follow the activity of the computers of the Plaintiffs and their all moves in the country and outside it.

Against other competitors and rivals of the Defendants were sent also criminals. Such criminals and set up people, who, hiding as customers or even friends of the Plaintiffs, created many situations, where the Plaintiffs were beaten, stabbed to death and police was called for them all the time, saying that the Plaintiffs are doing something wrong. By criminalizing their competitors, Defendants monopolized the whole market and paralyzed all their opponents.

8. The second attack against Plaintiff Antoaneta Iotova was made in November 2016, a week before the elections, where the Plaintiff was running for Florida Senator of the Republican Party in an area where the Democratic Party had a leading position before the Presidential elections. Her name has to be slandered and her chances smashed with force organized by the Democratic Party officials before the elections. She was accused of renting a property, that she doesn't own, accused of theft, when she is one of the owners of the corporation owner of the property and had full right to rent that property. The said corporation is used in a malicious prosecution, organized by the Defendants against the Plaintiffs. The said property is again stolen from Ocwen and "sold" to another attorney with the Russian name Ivan, who then transferred two times the same property to cover the traces of the theft.

9. Then we come to the culmination of the abuse and harassment against the Plaintiffs, with the idea to find out all the information they have about the activity of these corporations Defendants abroad, their government umbrella, and the channels of the money.

Federal agents, organized by the Preet Bharara, the US prosecutor, attacked the house of the Plaintiffs, searched and seized everything in the house, all the documents, all the electronic devices, all the court documents, all the registrations and other compromising documents against the Defendants. They confiscated all the computers of the Plaintiffs, passports, ID cards, any traces of their existence, and tied them with electronic devices, not to have any contacts with their friends and family and to literally die from hunger, because they are not able to search for work. Plaintiff Issak Almaleh is disabled 64 years old person, kept 45 days in Federal prison in isolator by the same people. When released he could hardly walk, used wheelchair and went to rehabilitation. He is not getting Social Security, because the same Defendants organized the scheme to stop his money. They closed his account in the bank, they closed his account in Pay Pal, they harassed him in any way they could. They even took the tablets of his minor kids they were doing their homework, shortly all the electronic devices of the family that they could use to communicate with the world. They were even left without telephones, cheap windows telephones. In short all the crimes done by the Defendants, they were trying to transfer to someone else to exit clean of the fraud. All the traces of the Defendants' crimes have to be destroyed and covered. The attack against the Plaintiffs was made by the Federal Deposit Insurance Corporation agents from Georgia, where is located the office of Ocwen and where he could find best support.

10. The Prosecution for this third case was made by US Attorney Preet Bharara, now fired by the new administration. The same person was working with agent Jamie Brooks, who pretended to work for FDIC, but signed herself her subpoenas claiming to work for private law firm Blanch. Who is that Blanch Law Firm with offices in New York and California to sign subpoenas on behalf of the Federal Government. Blanch Law Firm is a private criminal defense

attorneys firm, who also has a leading Indian in it Sumeet Sodhi, who claims to be specialist in foreclosure fraud. It is clear that the investigation was not done from federal agency but private corporation with private interests in the case. The leading attorney in Blanch Law firm is Ryan Blanch, not a Federal employee, with offices in New York and California where the leading attorney is with Russian origin Alana Yakovlev, also not federal employee.

11. While this company Blanch Law Firm operates in New York and California states, a company with similar name Blank and Rome LLP, (Rome could come from Roma, meaning Gypsy, popular name in Europe for the tribes that have Indian origin.) This Blank company is operating in South Florida, again with leading attorney with the Indian name Paul Sodhi, like the one that was working for the investigation against the Plaintiffs from Blanch Law Firm from New York, Sumeet Sodhi. Other Muslims are attached to that Law Firm like Abdullahi Abdullahi from Texas. These people in South Florida are hired to attack the Plaintiffs in civil cases. Now we are talking about an organized group of people to commit an organized crime, that has representatives in different states, very well organized and financed, all of them with Muslim origin.
12. The Defendants and their government supporters organized a fraudulent criminal case against the Plaintiffs in the Southern District of New York. They conducted it around the elections. That shows that the Defendants were in a hurry to hide their traces, scared by the rise of President Trump and the whole scheme is closely connected with the elections. Plaintiff Iotova is Doctor of Economics and Graduate from the Columbia University in New York in antiterrorism and security issues of the international relations. She is a Republican Party committeewoman and candidate for Florida Senator for the Republican Party. Antimuslim rhetoric of Trump scared the Defendants. Ocwen new ethnicity is mostly Muslims, who are trying to inflict Muslim religion in the United States. Looking at the pictures from Exhibit 3 are seen people from Alrisource that are doing some war connected rituals with cold weapons. Large amounts of the resources, accumulated through the said criminal scheme, are exported and used for the same reason, Islamization of

the United States and the whole world and actions against the patriot Act of 2001.

13. The court appointed attorney for Plaintiff Iotova In her criminal case in Southern District of New York is also from Indian origin, Mr. Patel. He was fraudulently trying to declare her crazy. This was an open attempt to shut her mouth. He cooperated with the probation to threaten her to obey his malicious orders. Cooperating with the probation officer, he lied to her that if she doesn't meet a psychiatrist they could have arrested her again. When she refused to do so, Mr. Patel declared that it is the only defense he can do for her defense in court. That is the only thing he can do, because the orders are coming from his masters, who are paying him. Patel is a private attorney, not public defendant, who is defending terrorists from Guantanamo. The said psychiatrist, who Mrs. Iotova met, tried to interrogate her about her knowledge about the said events, telling her that they could even torture her to get the necessary information.
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Plaintiffs start that claim on behalf of the United States of America. The fathers of our Democracy have envisioned long ago all the problems and the pitfalls that the country of Liberty and Justice for all could have in its route. So they developed further that principle from the Middle Ages for citizens to appear on behalf of their government in an action called also Lincoln Law.

Plaintiffs ask the Honorable court for the following:

1. They need protection from the court against further abuse, harassment and prosecution. Plaintiffs ask for protective order against the Defendants and other people involved. Plaintiffs' security is threatened and they are vulnerable to their enemies. They stay arrested in their home in South Florida, bound with electronic devices and can't go out. That way they are easy prey to any malicious people with evil intentions. They even can't talk to an attorney because any attempt to talk with an attorney has to be reported to the probation officer, so
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the meeting is jeopardized and not confidential and all the attorneys are scared to help.

2. Plaintiffs ask the Honorable Court to involve the Department of State and the Department of Justice and the President about the crimes against the United States of America, conducted by the said Defendants. Plaintiffs ask their active participation.
3. Plaintiffs ask the Honorable Court to order start of investigation against the Defendants and their criminal connections with government officials and their connections and supporters abroad. Plaintiffs ask to actively participate in that investigation as leading investigators. Plaintiffs can cooperate and help with the information that could lead to the restore of these 700 billion dollars in taxes, that are not going to the budget of the country, but finance illegal activities abroad. Plaintiffs ask for order from the court for budget for the said investigation from the Department of Finance of the amount of 1 million dollars to start the investigation.
4. Plaintiff asks the court to declare the prosecution against them, leading to case 2017- CRIM 0025 in Southern District of New York malicious and the case to be immediately closed.
5. Plaintiffs ask the Honorable Court Defendants to be charged with all the expenses for the investigation against them.
6. Plaintiffs ask an order for all the expenses for this action and the expenses of the Plaintiffs and their attorneys for the whole terror they were exposed in connection with the said abuse and harassment in the amount of 1 million dollars.

7. Plaintiffs ask for reasonable compensation from the government for the whistleblowing, to be compensated with not less than 20% of the restored money to the American people and to this great country.
8. Plaintiffs ask their companies to continue their legal activity untouched.
9. The said people owners and managers of the said corporations Defendants to be immediately arrested. Plaintiffs ask for immediate order from the court.
10. All the offices of the said corporations to be searched and seized, immediate order to be given by the court.
11. All the foreign people, corporations and entities, connected with the said crime to be extradited and Plaintiffs are asking for court order to be delivered to the responsible authorities abroad.
12. All the government agencies and officials, showing any connections with the said Defendants also to be searched and seized and if reasonable doubt of criminal connection exists to be arrested like the Defendants. To be investigated in the first place the prosecutors in the criminal case in Southern District of New York case 2017- CRIM 0025, and federal agents participating in the arrest of the Plaintiffs.
13. The case to be sealed till the Defendants are arrested and their offices searched and seized.

On behalf of the United States:

Antoaneta Iotova_____

Issak Almaleh_____

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Exhibit1

By Neil Garfield esq.

see New York Department of Housing vs Deutsch

Mysteriously seemingly knowledgeable legislators passed statutes permitting government agencies to finance mortgage loans in amounts for more than the property is worth, to people who could not afford to pay, without the need to document things such as income, and then to allow the chopping up the [*7]loans into little pieces to sell to new investors, so that if a borrower defaulted in repayment of the loan, the lender would not have the ability to prove it actually owned the debt, let alone plead its name correctly. The spell cast was so widespread that courts find almost everyone involved in mortgage foreclosure litigation raising the "Sgt. Schultz Defense" of "I know nothing."

Rather than assert its rights and perhaps obligations under the terms of the mortgage to maintain the property and its investment, respondent has asserted the Herman Melville "Bartleby the Scrivener Defense" of "I prefer not to" and relying on the word "may" in the document, has elected to do nothing in this regard. Because this loan appears to have been sold to investors, it may be asked, does not the respondent have a legal obligation to those investors to take whatever steps are necessary to preserve the property such as collecting the rents and maintain the property as permitted in the mortgage documents?

It should be noted that in its cross-motion in this action Deutsche asserts that its correct name is "Deutsche Bank National Trust Company, as Trustee for Saxon Asset Securities Trust 2007-3, Mortgage Loan Asset Backed Certificates, Series 2007-3" and not the name petitioner placed in the caption. Which deserves the response "you've got to be kidding."

Deutsche is not mentioned in the chain of title; it is listed in these HP proceedings with the same name as on the

caption of the foreclosure action in which it is the plaintiff and which its counsel drafted; and its name is not in the body of foreclosure action pleadings. In the foreclosure proceeding Deutsche pleads that it "was and still is duly organized and existing under the laws of the UNITED STATES OF AMERICA." However, there is no reference to or pleading of the particular law of the USA under which it exists leaving the court to speculate whether it is some federal banking statute, or one that allows Volkswagens, BMW's and Mercedes-Benz's to be imported to the US or one that permitted German scientists to come to the US and develop our space program after World War II.

As more and more cases are revealed or published, the truth is emerging beyond a reasonable doubt about the origination of the loans, the actual debt (identifying creditor and debtor), the note, the mortgage and the inevitable attempt at foreclosure and forced sale (forfeiture) of property to entities who have nothing to do with any actual transaction involving the borrower. The New York court quoted above describes in colorful language the false nature of the entire scheme from beginning to end.

The TRUTH of the matter, as we now know it includes but is not limited to the following:

1. **DONALD DUCK LOANS: NONEXISTENT Pretender Lenders:** Hundreds of thousands of loan closings involved the false disclosure of a lender that did not legally or physically exist. The money from the loan obviously came from somewhere else and the use of the non-existent entity name was a scam to deflect attention from the real nature of the transaction. These are by definition "table-funded" loans and when used in a pattern of conduct constitutes not only violation of TILA but is dubbed "predatory per se" under Reg Z. Since the mortgage and note and settlement documents all referred to a nonexistent entity, you might just as well have signed the note payable to Donald Duck, who at least is better known than American Broker's Conduit. Such mortgages are void because the party in whose favor they are drafted and signed does not exist. Such a mortgage should never be recorded and is subject to a quiet title action. The debt still arises by operation of law between the debtor (borrower) and the the creditor (unidentified lender) but it is not secured and the note is NOT presumptive evidence of the debt. THINK I'M WRONG? "SHOW ME A CASE!" WELL HERE IS ONE FOR STARTERS: 18th Judicial Circuit BOA v Nash VOID mortgage Void Note Reverse Judgement for Payments made to non-existent entity
2. **DEAD ENTITY LOANS: Existing Entity Sham Pretender Lender:** Here the lender was alive or might still be alive but it is and probably always was broke, incapable of loaning money to anyone. Hundreds of thousands of loan closings involved the false disclosure of a lender that did not legally or physically make a loan to the borrower (debtor). The money from the loan obviously came from somewhere else and the use of the sham entity name was a scam to deflect attention from the real nature of the transaction. These are by definition "table-funded" loans and when used in a pattern of conduct constitutes not only violation of TILA but is dubbed "predatory per se" under Reg Z. Since the mortgage and note and settlement documents all referred to an entity that did not actually loan money to the borrower, (like The Money Source) such mortgages are void because the party in whose favor they are drafted and signed did not fulfill a black letter element of an enforceable contract — consideration. Such a mortgage should never be recorded and is subject to a quiet title action. The debt still arises by operation of law between the debtor (borrower) and the the creditor (unidentified lender) but it is not secured and the note is NOT presumptive evidence of the debt.
3. **BRAND NAME LOANS FROM BIG BANKS OR BIG ORIGINATORS:** Here the loans were disguised as loans from the entity that could have loaned the money to the borrower — but didn't. Millions of loan closings involved the false disclosure of a lender that did not legally or physically make a loan to the borrower (debtor). The money from the loan came from somewhere else and the use of the brand name entity (like Wells Fargo or Quicken Loans) name was a scam to deflect attention from the real nature of the transaction. These are by definition "table-funded" loans and when used in a pattern of conduct constitutes not only violation of TILA but is dubbed "predatory per se" under Reg Z. Since the mortgage and note and settlement documents all referred to an entity that did not actually loan money to the borrower, such mortgages are void because the party in whose favor they are drafted and signed did not fulfill a black letter element of an enforceable contract — consideration. Such a mortgage should never be recorded and is subject to a quiet title action. The debt still arises by operation of law between the debtor (borrower) and the the creditor (unidentified lender) but it is not secured and the note is NOT presumptive evidence of the debt.
4. **TRANSFER WITHOUT SALE:** You can't sell what you don't own. And you can't own the loan without paying for its origination or acquisition. Millions of foreclosures are predicated upon acquisition of the loan through a nonexistent purchase — but facially valid paperwork leads to the assumption or even presumption that the sale of the loan took place — i.e., delivery of the loan documents in exchange for payment received. These loans can be traced down to one of the three types of loans described above by asking the question "Why was there no payment." In turn this inquiry can start from the question "Why is the Trust not named as a holder in due course?" The answer is that an HDC must acquire the loan for value and receive delivery. What the banks are doing is showing evidence of delivery and an "assignment" or "power of attorney" that has no basis in real life — the endorsement of the note or assignment of the mortgage was fabricated, robo-signed and is subject to perjury in court testimony. Using the Pooling and Servicing Agreement only shows that more fabricated paperwork was used to fool the court into thinking that there is a pool of loans which in most cases does not exist — a t least not in the REMIC Trust.

5. **VIOLATION OF THE TRUST DOCUMENT:** Most trusts are governed by New York law. Some of them are governed by Delaware law and some invoke both jurisdictions (see Christiana Bank). The laws that MUST be applied to the REMIC Trusts declare that any action taken without express authority from the Trust instrument is VOID. The investors still have not been told that their money never went into the trust, but that is what happened. They have also not been told that the Trust issued mortgage bonds but never received the proceeds of sale of those bonds. And they have not been told that the Trust, being unfunded, never acquired the loans. And that is why there is no assertion of holder in due course status. Some courts have held that the PSA is irrelevant — but they are failing to realize that such a ruling by definition eliminates the foreclosure as a viable action; that is true because the only basis of authority to pursue foreclosure, collection or any other enforcement of the sham loan documents is in the PSA which is the Trust document.
6. **THIRD PARTY PAYMENTS WITHOUT ACCOUNTING:** “Servicer” advances that are actually made by the servicer but pulled from an account controlled by the broker dealer who sold the mortgage bonds. These payments continue regardless of whether the borrower is paying or not. Banks fight this issue because it would require that the actual creditors be identified and given notice of proceedings that are being pursued contrary to the interests of the investors. Those payments negate any default between the debtor and the actual creditor who has been paid. They also reduce the amount due. The same holds true for proceeds of insurance, guarantees, loss sharing with the FDIC and proceeds of hedge products like credit default swaps. Legally it is clear that these payments satisfies the payments due from the borrower but gives rise to an unsecured volunteer payment recapture through a claim for unjust enrichment. That could lead to a money judgment, the filing of the judgment and the foreclosure of the judgment lien. But the banks don't want to do that because they would definitely be required to show the money trail — something they are avoiding at all costs because it would unravel the entire fraudulent scheme of “securitization fail.” (Adam Levitin's term).
7. **ESTOPPEL: Inducing people to go into default so that there can be more foreclosures:** Millions of people called the servicer asking for a modification or workout that the servicer obviously had no right to entertain. The servicer customer representative gave the impression that the borrower was talking to the right person. And this trusted person then started practicing law without a license by advising that modifications could not be requested until the borrower was at least 90 days in arrears. All of this was a lie. HAMP and other programs do NOT require 90 day arrearage. The purpose was to get homeowners in so deep that they could never get out because the servicers are charged with the job of getting as many loans into foreclosure as possible. By telling the borrower to stop paying they were (a) telling them the right thing because the servicer actually had no right to collect the payment anyway and (b) they put the servicer in an estoppel position — you can't tell a borrower to stop paying and then say THEY breached the “agreement”. Stopping payment was a the request or demand of the servicer. Further complicating the process was the intentional loss of submissions by borrowers; the purpose of these “losses” (like “lost notes” was to elongate the process and get the borrower deeper and deeper into the false arrearage claimed by the servicer.

The conclusion is obvious — complete strangers to the actual transaction (between the actual debtor and actual creditor) are using the names of other complete strangers to the transaction and faking documents regularly to close out serious liabilities totaling trillions of dollars for “faulty”, fraudulent loans, transfers and foreclosures. As pointed out in many previous articles here, this is often accomplished through an Assignment and Assumption Agreement in which the program requires violating the Truth in Lending Act (TILA) and the Real Estate Settlement and Procedures Act (RESPA), the HAMP modification program etc. Logically it is easy to see why they allowed “foreclosures” to languish for 5-8 years — they are running the statute of limitations on TILA violations, rescission etc. But the common law right of rescission still exists as does a cause of action for nullification of the note and mortgage.

The essential truth in the bottom line is this: the paperwork generated at the loan closing is “faulty” and most often fabricated and the borrower is induced to execute documents that create a second liability to an entity who did nothing in exchange for the note and mortgage except get paid as a pretender lender — all in violation of disclosure requirements on Federal and state levels. This is and was a fraudulent scheme. Hence the “Clean hands” element of equitable relief in foreclosure as well as basic contract law prevent the right to enforce the mortgage, the note or the debt against the debtor/borrower by strangers to the transaction with the borrower.

Exhibit 2

Foreclosure fraud: AG releases critical report(Report is from Attorney General Florida 2011)

By: William E. Lewis Jr.

“Day after a reported settlement between Bank of America, JP Morgan Chase, Citigroup, Wells Fargo and Ally Financial with attorneys general across the U.S. in the foreclosure epidemic, Florida Attorney General Pam Bondi released a highly critical presentation detailing legal issues surrounding the crisis.

The presentation, titled "Unfair, Deceptive and Unconscionable Acts in Foreclosure Cases," was provided by the attorney general's economic crimes division during an early December conference of the Florida Association of Court Clerks and Comptrollers as an overview and was not representative of any specific misconduct.

The comprehensive presentation was compiled in exploration of foreclosure malpractice and condemns banks, mortgage servicers, and law firms for contributing to the crisis by cutting corners.

Although not aimed at a specific case, four of Florida's largest foreclosure law firms are under investigation by the state. The Florida Default Law Group, the Law Offices of Marshall C. Watson, P.A.; the Law Offices of David J. Stern, P.A.; and Shapiro & Fishman, LLP, all have denied wrong doing.

Sweeping evidence of mortgage fraud was outlined in the 98-page presentation complete with copies of alleged forged signatures, false notarizations, bogus witnesses and improper mortgage assignments. Examples of alleged fraud and missteps made during the securitization process by major financial institutions when they wrote, packaged, and sold mortgages during the boom years was also provided.

The "Unfair, Deceptive and Unconscionable Acts in Foreclosure Cases" presentation meticulously documents cases of questionable signatures, notarizations that could not have occurred when claimed due to expired notary commissions and foreclosures filed by banks or law firms that lacked legal standing to foreclose on a particular property.

The presentation also focused largely on assignments of mortgage, a legal document that transfers ownership of mortgages from one bank to another. Mortgage assignments became an issue after the real estate boom, when mortgages were sold and resold, packaged into securitized trusts and otherwise transferred in a fashion that made tracking difficult.

"The Attorney General's Office has a long standing commitment to fighting mortgage fraud and is dedicated to continuing this critical effort," said Florida Attorney General Pam Bondi. "Since 2008, our office has started over 150 formal mortgage fraud investigations, 70 which remain active, 21 that resulted in civil lawsuits, and over 50 companies in review."

As the foreclosure crisis mounted, banks and law firms appointed people to create assignments, of which tens of thousands were executed by robo-signers who failed to properly verify the claims in which they were swearing upon.

In one example, the signature of an individual named Linda Green appears -- in varying styles -- on hundreds of thousands of mortgage documents from dozens of banks and mortgage companies.

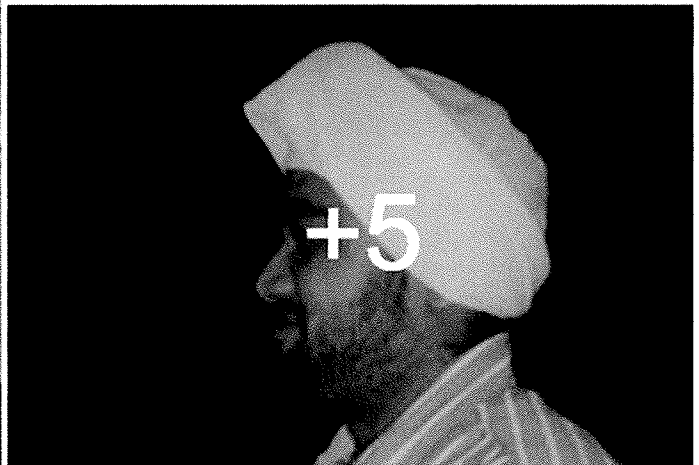
In another example, the signature of Scott Anderson, an employee of West Palm Beach-based Ocwen Financial Corp., appears in four styles on mortgage assignments.

Paul Koches, executive vice president of Ocwen, has acknowledged that the signatures were not all Anderson's, "but that doesn't mean they were forged," he said. "Certain employees were given authorization to sign for Anderson on mortgage assignments." Once the robo-signing crisis was revealed, Ocwen stopped allowing other employees to sign for Anderson.

"For the sake of expediency, no one bothered to verify or otherwise validate these assignments and affidavits prior to signing them," says Carlos J. Reyes, a foreclosure defense attorney with the Reyes Law Group in Fort Lauderdale. "In some cases, courts have found that banks did not have standing to foreclose on the property sued upon."

Exhibit 3


Altisource(Ocwen)



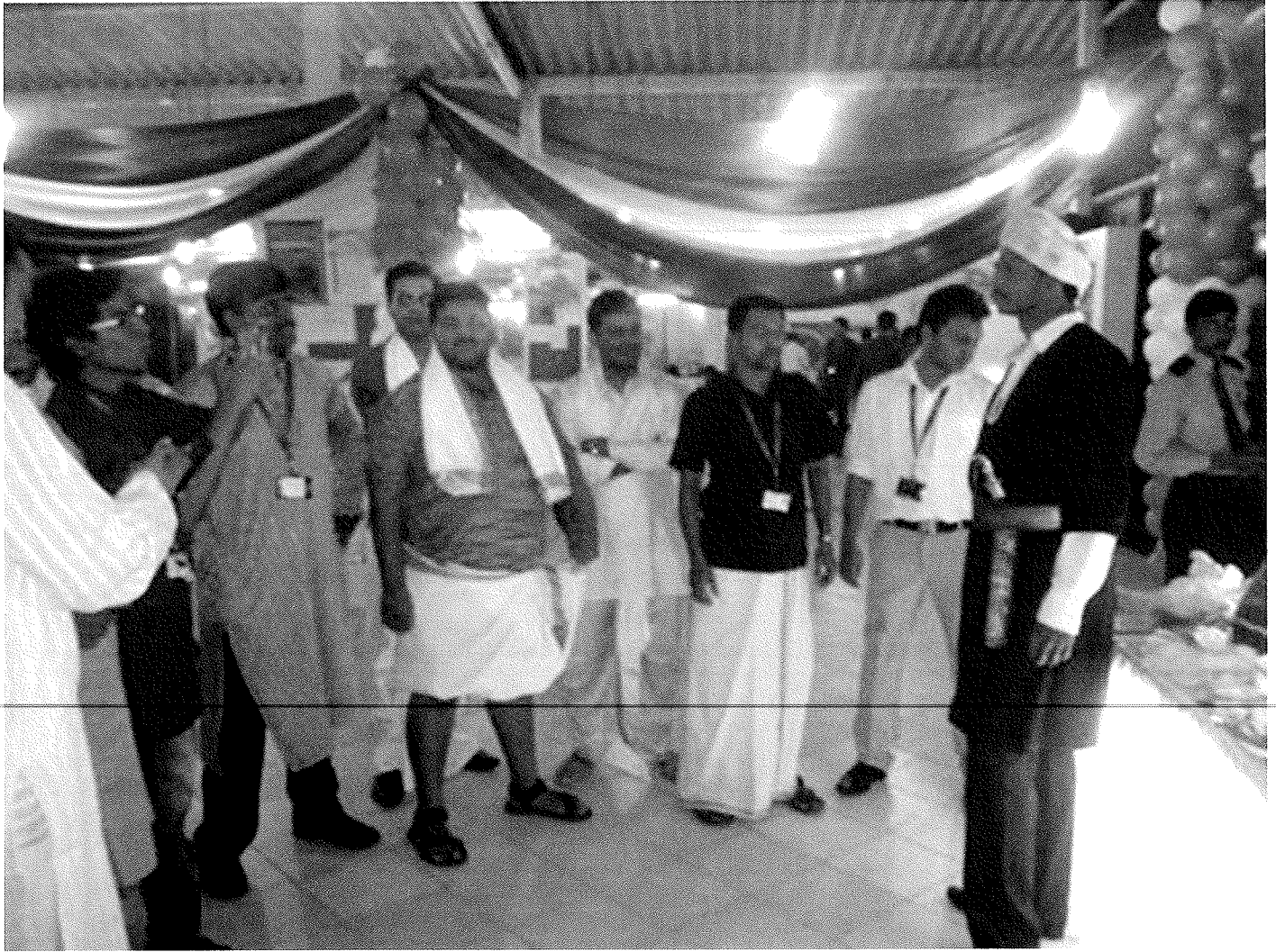




Mahesh Reddy added a new photo — at  Altisource Business Solution Pvt Ltd.

August 14, 2013 · Mumbai, India ·  · 









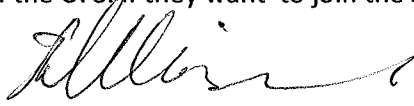
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Dear Sirs,

Please file the said case under seal, with Plaintiff United States of America, please send a copy to the Attorney General of the U. S. if they want to join the said qui tam action.

Antoaneta Iotova



Issak Almaleh



Please, Plaintiff asks for
Jury trial.

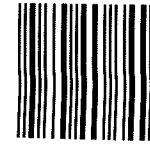
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